

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
HATICE CEYLAN ILYAS SAVAS	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy to convey false information and threats about carrying an explosive device on an airplane - 1 count)
	:	49 U.S.C. § 46507 (conveying false information and threats about carrying an explosive device on an airplane - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. Between on or about June 1, 2004 and on or about June 2, 2004, in the Eastern District of Pennsylvania and elsewhere, defendants

HATICE CEYLAN and

ILYAS SAVAS

conspired and agreed, willfully, maliciously, and with reckless disregard for the safety of human life, to give information that they knew to be false and which could reasonably be believed, about an attempt being made to carry an explosive device on an airplane, in violation of Title 49, United States Code, Section 46507.

MANNER AND MEANS

2. It was a part of the conspiracy that defendants HATICE CEYLAN and ILYAS SAVAS agreed to make a bomb threat concerning two American Airlines flights to delay the flight and allow defendant HATICE CEYLAN to find her passport.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants HATICE CEYLAN and ILYAS SAVAS committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 2, 2004, defendant HATICE CEYLAN told defendant ILYAS SAVAS that she could not find her passport and would not be able to search for it at her school until 6:00 a.m. that morning

2. On or about June 2, 2004, defendants HATICE CEYLAN and ILYAS SAVAS agreed to make a phone call stating that a bomb was on American Airlines flights 4543 and 156, so that those flights would be delayed.

3. On or about June 2, 2004, defendant ILYAS SAVAS made a phone call to Embassy Suites Hotel and stated that a bomb was on American Airlines flights 4543 and 156.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2004, at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

HATICE CEYLAN and

ILYAS SAVAS

willfully and maliciously, and with reckless disregard for the safety of human life, gave, caused to give, and aided and abetted the giving of, information that they knew to be false, and which could reasonably be believed, about an attempt being made to carry an explosive device on an airplane.

In violation of Title 49, United States Code, Section 46507 and Title 18, United States Code, Section 2.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney